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February 13, 2022

By ECF

The Honorable Vincent L. Briccetti
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, NY 10601-4150

Re: In re: HBL SNF, LLC, Case No. 22-cv-06254 (VB)

Dear Judge Briccetti:

We write jointly on behalf of all parties to the appeal to provide a status report. As previously reported to this Court, the parties have reached a global settlement in principle of all issues in the case subject to final documentation.

HBL-SNF has received a financing term sheet from CIBC providing the financing necessary to consummate the sale transaction between HBL-SNF and White Plains and thereby settling all claims in the pending actions including the foreclosure action brought by Security Benefit.

There were three terms of the financing that required further negotiation with CIBC and all three of those issues have been resolved to the satisfaction of HBL-SNF, the term sheet has been executed, and the \$100,000 deposit made. The property appraisal has been commissioned and we expect to receive the valuation report on or before February 28th. We are now beginning the process of finalizing the transaction loan documents.

We continue to exercise best efforts to complete the sale transaction and consummate the global settlement of the action pending before Your Honor.

Respectfully yours,

A handwritten signature in black ink, appearing to read "John Giardino", with a large, stylized flourish extending from the end of the signature.

John Giardino

cc: Counsel of Record (by ECF)